

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

CYNTHIA GEIGER,

Plaintiff,

v.

RYAN FULLER SMALLWOOD,

Defendant.

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CIVIL ACTION NO.: 3:06cv194-WHA

**DEFENDANT RYAN FULLER SMALLWOOD'S**  
**OBJECTIONS TO PLAINTIFF'S EXHIBITS**

Comes now the Defendant Ryan Fuller Smallwood in the above-styled action and objects to the Plaintiff's Exhibits received on April 16, 2007, and moves the Court to disallow the exhibits listed therein. The Defendant reserves any and all Objections to said Exhibits until such time as the Plaintiff's attorney and the Defendant's attorney can meet to discuss the purpose for which some of the exhibits are to be offered. The Defendant's attorney is willing to meet with the Plaintiff's attorney at any convenient time to try to resolve any Objections. Without waiving or limiting this general Objection, the Defendant states the following additional Objections to the numbered Exhibits:

1. No objection.
2. The Defendant reserves any and all Objections to medical records from Dr. William E. Adams until such time as the Defendant's attorney and the Plaintiff's attorney are able to meet and review the proposed Exhibit to make sure that no inadmissible evidence is contained therein. The Defendant specifically reserves any and all Objections to Dr. Adams' January 4, 2005 History and Physical office note as to the Discussion section, as what is stated in this section is not exactly what Dr. Adams

said in his deposition.

3. The Defendant reserves any and all Objections to medical records from Columbus Regional Medical Center until such time as the Defendant's attorney and the Plaintiff's attorney are able to meet and review the proposed Exhibit to make sure that no inadmissible evidence is contained therein. The Defendant specifically reserves any and all Objections to Dr. Adams' January 4, 2005 History and Physical office note as to the Discussion section, as what is stated in this section is not exactly what Dr. Adams said in his deposition.
4. The Defendant reserves any and all Objections to any medical bills relating to the Plaintiff's surgery, as the proper proof has not been offered. The Plaintiff has not established that any medical bills related to the Plaintiff's surgery were reasonable, necessary, or caused by this accident.

The Defendant reserves any and all other Objections to the Plaintiff's Exhibits.

s/ Stanley A. Martin  
Stanley A. Martin (MAR049)  
Attorney for Defendant  
Ryan Fuller Smallwood

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served an exact copy of the foregoing Defendant's Objections to Plaintiff's Exhibits upon the following counsel of record, by depositing a copy of same in the United States Mail, properly addressed with first class postage prepaid thereon.

Honorable Benjamin H. Parr  
Post Office Box 229  
Opelika, Alabama 36803

This 23rd day of April, 2007.

s/ Stanley A. Martin  
Stanley A. Martin